

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	
v.)	Criminal Number 1:05CR69
)	
HANS GOUW,)	
a.k.a. Liong Hoat Gouw,)	
a.k.a. Hady Gandasaputra,)	
)	
Defendant)	

CRIMINAL INFORMATION

Count 1: Conspiracy to Commit Immigration Fraud

THE UNITED STATES ATTORNEY CHARGES THAT:

From at least December 1, 1999, through November 22, 2004, in the Eastern District of Virginia, the defendant, HANS GOUW, knowingly conspired with others known and unknown to the United States to commit an offense against the United States, namely immigration fraud, and during this same time the defendant and his co-conspirators did an act to effect the object of the conspiracy, in violation of Title 18, United States Code, Sections 371 and 1546. Subsection (a) of Section 1546 penalizes whoever knowingly makes under oath, or as permitted under penalty of perjury under Section 1746 of Title 28, United States Code, knowingly subscribes as true, any false statement with respect to a material fact required by the immigration laws and regulations prescribed thereunder, and knowingly presents any such application which contains any such false statement and which fails to contain any reasonable basis in law or fact.

Specifically, from at least December 1, 1999, through November 22, 2004, in Fairfax and Arlington Counties, Virginia, the defendant and other individuals associated with him knowingly conspired to prepare fraudulent Applications for Asylum and Withholding of Removal (forms I-589) and fraudulent Applications for Alien Employment Certification to the Department of Labor (forms ETA 750). In furtherance of this same conspiracy, the defendant and his fellow conspirators did in fact prepare fraudulent asylum applications and present them to the Immigration and Naturalization Service and to its successor, the Department of Homeland Security. Similarly, the defendant and his fellow conspirators did in fact prepare fraudulent alien employment certification applications and present them to the Department of Labor.

(In violation of Title 18, United States Code, Sections 371 and 1546(a).)

Count 2: Conspiracy to Commit Identification Document Fraud

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

From on or about December 27, 1999, through on or about September 19, 2001, in the Eastern District of Virginia, the defendant, HANS GOUW, knowingly conspired with others to produce Virginia driver's licenses and identification cards without lawful authority when such production would be in or affect interstate or foreign commerce, in violation of Title 18, United States Code, Section 1028. Specifically, from on or about December 27, 1999, through on or about September 19, 2001, the defendant knowingly conspired with other individuals to prepare and submit false Virginia Residency Certifications (forms DL51) to clerks of the Virginia Department of Motor Vehicles at various Virginia DMV offices, including offices in Fairfax and Arlington Counties, Virginia, in order to cause those same clerks to produce Virginia driver's licenses and identification cards in violation of Virginia law.

(In violation of Title 18, United States Code, Section 1028(a)(1), (b)(1)(A)(ii), (c)(3)(A), and (f).)

Count 3: Conspiracy to Commit Sex Trafficking

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

From in and around April 2004 through on or about November 18, 2004, in the Eastern District of Virginia and elsewhere, the defendant, HANS GOUW, knowingly conspired with others known and unknown to the United States to commit an offense against the United States, namely sex trafficking, and during this same time the defendant and his fellow conspirators did an act to effect the object of the conspiracy, in violation of Title 18, United States Code, Sections 371 and 1591. Subsection (a)(1) of Section 1591 penalizes whoever, knowingly and in a manner in and affecting interstate and foreign commerce, recruits or entices a person knowing that the person has not attained the age of 18 years and will be caused to engage in a commercial sex act.

Specifically, from in and around April 2004 through on or about November 18, 2004, in Fairfax County, Virginia, and the Republic of Indonesia, the defendant and other individuals associated with the Chinese Indonesian American Society knowingly conspired to recruit young Indonesian women, including minors above the age of 14, to come to the United States to engage in nude striptease and prostitution. In furtherance of this same conspiracy, the defendant and his fellow conspirators did in fact identify and attempt to recruit numerous Indonesian women, including minors between the ages of 15 and 17.

(In violation of Title 18, United States Code, Sections 371 and 1591(a).)

Count 4: Money Laundering

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about June 25, 2004, in the Eastern District of Virginia, the defendant, HANS GOUW, knowingly transferred and attempted to transfer a monetary instrument and funds from a place in the United States to or through a place outside of the United States with the intent to promote the carrying on of specified unlawful activity. Specifically, on or about June 25, 2004, in Fairfax County, Virginia, the defendant transferred \$2,000 from a Wachovia Bank account (formerly First Union) in his control in the United States to an account in the Republic of Indonesia belonging to one of the defendant's associates. At the time of the transfer, the defendant intended the transfer to promote his illegal activities to recruit and bring young Indonesian women, including women under the age of 18, to the United States so that the women could engage in nude striptease and prostitution, in violation of Title 18, United States Code, Section 1591. Title 18, United States Code, Section 1591 is a specified unlawful activity as that term is defined in Title 18, United States Code, Section 1956(c)(7)(A). (In violation of Title 18, United States Code, §§ 2 and 1956(a)(2)(A).)

Notice of Criminal Forfeiture

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

Upon conviction of the offenses charged in count 1 of this information, the defendant shall forfeit to the United States any property, real or personal, that constitutes, or is derived from or is traceable to, the proceeds obtained directly or indirectly from the commission of those offenses, or any property, real or personal, that is used to facilitate, or is intended to be used to facilitate, the commission of this offense.

Upon conviction of the offense charged in count 2 of this information, the defendant shall forfeit to the United States any property constituting, or derived from, proceeds the defendants obtained directly or indirectly, from the commission of this offense.

Upon conviction of the offense charged in count 4 of this indictment, the defendant shall forfeit to the United States any property, real or personal, involved in such offense, or any property traceable to such property.

This property includes, but is not limited to, \$300,000.

(Pursuant to Title 18, United States Code, Section 982(a)(1), (a)(2), and (a)(6).)

Paul J. McNulty
United States Attorney

By: _____
John T. Morton
Assistant United States Attorney